

## REMARKS

This application has been carefully reviewed in light of the Office Action dated May 12, 2005. Claims 1-3, 5-12, 14-20, 22-29, 31-37, 39-46 and 48-60 are in the application, of which the following claims are independent: Claims 1, 10, 18, 27, 35, 44, 58, 59 and 60. Reconsideration and further examination are respectfully requested.

The Office Action entered a rejection of Claims 1, 10 and 27 under 35 U.S.C. § 112, second paragraph, over questions concerning the interrelationship between objects. In response, all claims herein (with the exception of Claim 60) have been amended so that the interrelationship is defined as “an interrelationship between one object with at least one other object”. In the context of Claim 60, the interrelationship is defined as “an interrelationship between one object in the single image with at least one other object within the single image, wherein the interrelationship is a contextual relationship between the objects as they appear in the image.” Withdrawal of the § 112 rejection is therefore respectfully requested.

All claims were further rejected under 35 U.S.C. § 102(a) over U.S. Patent 5,761,655 (Hoffman). The rejection is respectfully traversed, for the reason that Hoffman does not discuss the concept of a word that describes an interrelationship between one object with at least one other object, as detailed more fully below.

The invention concerns management of a retrieval image, and a single image might include a plurality of objects. Relevant information is stored in association

with the single image, and the relevant information includes a word describing an interrelationship between one object with at least one other object.

In one representative (but non-limiting) example described in the specification, an image such as that shown in Figure 3 might include a plurality of objects such as a standing man, a cat, a table and a mouse. Relevant information is stored in association with this single image, such as the information shown at Figure 4. This information includes a word (such as the word “eating”) that describes the interrelationship between one object (the cat) and at least one other object (the mouse).

In contrast to the foregoing, Hoffman describes a thumbnail image and indexing thereof. Referring specifically to Figure 9 of Hoffman (which is discussed in the Office Action at the paragraph bridging pages 9 and 10), Hoffman displays thumbnail images for viewing by a user, and further displays textual information in conjunction with the thumbnail images. It is Applicants’ understanding, however, that this textual information is nothing more than the file name of the image, and is not a “word describing an interrelationship between one object with at least one other object” or a plurality of objects within a single image.

Other portions of Hoffman describe the use of keyword searching, and beginning at column 11, Hoffman describes the use of a keyword database 422. These keywords are understood to be customizable by the user, and any keywords can be entered and searched. Even so, however, such keywords are not seen to be the same thing as the claimed “word describing an interrelationship between one object with at least one other

"object" out of plural objects in a single image. Rather, these keywords might describe the content of an image, but Hoffman makes no mention of the possibility that they also describe an interrelationship between one object with at least one other object.

It is therefore respectfully submitted that the claims herein defines an invention that differs patentably from anything described by Hoffman, and allowance of the claims herein is respectfully requested.

Applicants' undersigned attorney may be reached in our Costa Mesa, California office by telephone at (714) 540-8700. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

  
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